

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE**

**SNMP RESEARCH, INC. and SNMP  
RESEARCH INTERNATIONAL, INC.,**

**§ Case No. 3:20-cv-00451**

**Plaintiffs,**

**§**

**v.**

**§**

**BROADCOM INC.; BROCADE  
COMMUNICATIONS SYSTEMS LLC;  
AND EXTREME NETWORKS, INC.**

**Jury Demand**

**Defendants.**

**§**

**§**

**SUPPLEMENTAL DECLARATION OF OLIVIA L. WEBER IN SUPPORT OF  
PLAINTIFF'S MOTION TO COMPEL RESPONSES FROM DEFENDANTS BROADCOM  
INC. AND BROCADE COMMUNICATIONS SYSTEMS LLC**

I, Olivia L. Weber, declare and attest as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for SNMP Research, Inc. (“SNMP Research” or “Plaintiff”) and SNMP Research International, Inc. (together, “Plaintiffs” or “SNMP”) in this action. I am a member in good standing of the State Bar of California and have been admitted pro hac vice to this Court. I have personal knowledge of the facts set forth in this Declaration and, if called to testify, I could and would testify competently thereto under oath.

2. During a November 12, 2021 meet and confer call regarding Defendants Broadcom Inc.’s (“Broadcom”) and Brocade Communications Systems LLC’s (“Brocade) supplemental responses to Plaintiff’s discovery requests, the parties discussed Brocade Request for Production 55, which seeks documents relating to Broadcom Inc.’s “sharing, either directly or indirectly, in the revenues, profits, or losses from the transfer” of Plaintiff’s software from Brocade to Extreme. Brocade’s counsel, Alison Plessman, asked what Plaintiff meant by “directly or indirectly” sharing profits. Plaintiff’s counsel, John Wood, explained that this request asked whether

Broadcom Inc. shared at all in the proceeds from the sale/divestiture of Brocade's Data Center Division to Defendant Extreme Networks Inc. In response, Brocade's counsel promised to amend Broadcom's and Brocade's responses to state that there are no agreements between Broadcom Inc. and Brocade to share in profits from the divestiture other than the general parent-subsidiary relationship. To date, Defendants have not amended their responses in accordance with this agreement.

3. On December 30, 2021, I located the Brocade/Broadcom reference manual entitled "Brocade Fabric OS MIB Reference Manual, 9.0.x" at <https://docs.broadcom.com/FOS-90x-MIB-RM>. The word "Broadcom" is listed on every page of this "Brocade" manual. A copy is attached hereto as Exhibit A.

Executed this 30th day of December, 2021, at Newport Beach, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Olivia L. Weber  
Olivia L. Weber